



MEMO ENDORSED

STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES  
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL  
LITIGATION BUREAU

August 16, 2022

**By ECF**

Hon. Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

**Re: *Kliot v. Marchionno et al.*  
Case No.: 7:22-cv-00597-KMK  
Joint Request for a Stay of Discovery Until the Resolution of Defendants'  
Motion to Disqualify**

Dear Judge Karas:

The parties write jointly to respectfully request a stay of discovery until the resolution of Defendants' Motion to Disqualify Plaintiff's Counsel.

On July 29, 2022 Defendants' filed a pre-motion letter requesting permission to file a motion to disqualify Plaintiff's Counsel, based on Counsel's prior representation of Defendant Marchionno in divorce proceedings. ECF No. 26. Plaintiff responded on August 5, 2022. ECF No. 28. On August 15, 2022 the parties attended a discovery conference with Magistrate Judge Krause to discuss the letters and establish a briefing schedule.

At the conference, Judge Krause assigned a briefing schedule. Defendants' motion is due to be filed and served on or before September 16, 2022. Plaintiff's response is due on October 14, 2022. Defendants' reply is due on October 28, 2022.

Judge Krause also recommended that the parties send Your Honor a joint letter requesting a stay of discovery pending resolution of the disqualification motion. Both parties have agreed to join this request. The requested stay would help to conserve the resources of the parties and the Court and avoid duplication of work, as it would ensure that the disqualification issue is resolved before discovery proceeds in earnest.

Therefore, the parties jointly respectfully request a stay of discovery until the resolution of the motion. Current discovery deadlines are October 5, 2022, for fact discovery and December 5, 2022, for expert discovery.

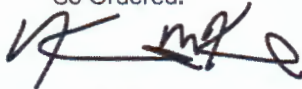
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The parties also respectfully request that the conference before Your Honor currently scheduled for September 28, 2022 be adjourned until after the motion is resolved.

Thank you for your consideration of this request.

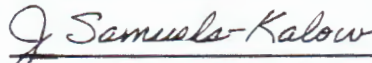
Both requests are granted. The Parties are to notify the Court immediately after Judge Krause resolves the Motion to Disqualify.

So Ordered.



8/22/22

Respectfully submitted,



Jacob Samuels-Kalow, Esq.  
Assistant Attorney General  
Counsel for Defendants



Vincent F. Sykes, Esq.  
Plaintiff's Counsel

cc: All counsel of record (via ECF)